

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
DISTRICT COURT STATE OF OKLAHOMA

JOEL J. REED, Et Al.,)
)
Plaintiff,)
)
Vs.) Case No. CJ-2005-8975
)
STATE OF OKLAHOMA, EX REL)
THE DEPARTMENT OF AGRICULTURE)
FOOD AND FORESTRY,)
)
Defendant.)

* * * * *

DEPOSITION OF BETTY ANDERSON

TAKEN ON BEHALF OF THE DEFENDANT

ON MAY 9, 2006

IN KANSAS, OKLAHOMA

APPEARANCES:

MR. D. KENYON WILLIAMS, JR., Hall, Estill, Hardwick,
Gable, Golden & Nelson, 320 S. Boston Avenue, Suite 400,
Tulsa, Oklahoma 74103-3708, appearing on behalf of the
Witness.

MR. M. DANIEL WEITMAN, MS. ELLEN A. PHILLIPS, MS. KELLY BURCH, Attorney at Law, 4545 North Lincoln Boulevard, Suite 260, Oklahoma City, Oklahoma 73105, appearing on behalf of the Defendant.

MS. NIKI CUNG, Kutak Rock, LLP, 214 W. Dickson Street, Fayetteville, Arkansas, 72701, appearing on behalf of Tyson Foods.

MS. NICOLE M. LONGWELL, Joyce, Paul & McDaniel, 1717
South Boulder, Suite 200, Tulsa, Oklahoma, 74119,
appearing on behalf of Peterson Farms.

Also Present: MR. Bill Anderson

REPORTED BY:
SUSAN R. ROGERS, C.S.R.

1 BETTY ANDERSON,

2 Having been duly sworn, testified as follows;

3 DIRECT EXAMINATION

4 BY MR. WEITMAN:

5 Q. Miss Anderson, will you state your full name
6 for me, please?

7 A. Betty Anderson.

8 Q. Miss Anderson, what's your address?

9 A. 18861 East 570 Road, Colcord, Oklahoma,
10 74338.

11 Q. And are you married?

12 A. Yes.

13 Q. What's your husband's name?

14 A. Bill Anderson.

15 Q. This 18861, that's a house?

16 A. Yes.

17 Q. What do you do for a living, ma'am?

18 A. We raise cattle and chickens.

19 Q. Do you raise chickens at that 18861 East 570
20 Road?

21 A. Actually the chicken house has a different
22 address and I do not know that.

23 Q. Okay. Is the chicken house located on the
24 same piece of property as your residence?

25 A. Yes, it is.